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BY ECF

October 15, 2020

The Honorable William H. Pauley III
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Daniels*, 19 Cr. 931-WHP-3 (S.D.N.Y.)

Dear Judge Pauley:

We represent Defendant Quinteria Daniels in the above-captioned case. We write to request, with the consent of the Government and Pre-Trial Services, a modification of Ms. Daniels's conditions of release to allow her to take her children, on one day this weekend, to an indoor play center for her daughter's birthday, as described below. On November 25, 2019, Ms. Daniels was ordered released on a \$50,000 Appearance Bond to be secured by two financially responsible persons. Among other conditions of her release, Ms. Daniels was subject to a restriction limiting her travel to the Southern and Eastern Districts of New York and the District of New Jersey. On August 27, 2020, Ms. Daniels's bail was modified to include home detention in Harrisburg, Pennsylvania.

We respectfully request that Ms. Daniels be allowed to take her daughters to Monkey Joe's, a children's indoor play center, located at 3608 Hartzdale Drive in Camp Hill, Pennsylvania, one town over from Harrisburg, this Saturday, October 17, 2020, to celebrate her oldest daughter's birthday (which falls on October 20th). As Your Honor is aware, Ms. Daniels is scheduled for a change of plea hearing on October 21, 2020, and is fully committed to appearing in Court that day.

We have conferred with Ms. Daniels's Pretrial Officer in Pennsylvania, who consents to this request. AUSA Rebecca Dell advised she was happy to defer to pretrial.

Thank you for your consideration.

Respectfully submitted,

Application granted.

SO ORDERED:

/s/ Brooke Cucinella
Brooke Cucinella


WILLIAM H. PAULEY III
U.S.D.J.

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ANGELES PALO ALTO SÃO PAULO SEOUL TOKYO WASHINGTON, D.C.

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